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PROPOSED ATTORNEYS FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	
	§	
REVOLUTION MONITORING, LLC	§	CASE NO. 18-33730-hdh
	§	
	§	
REVOLUTION MONITORING	§	CASE NO. 18-33731-hdh
MANAGEMENT LLC,	§	
	§	
REVOLUTION NEUROMONITORING LLC	§	CASE NO. 18-33732
	§	
Debtors.	§	(Jointly Administered)

MOTION FOR SUBSTITUTION OF COUNSEL

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW, Joyce W. Lindauer Attorney, PLLC and files this Motion to Substitute Counsel and would show the Court as follows:

1. This Motion for Substitution of Counsel is brought by Joyce W. Lindauer (“Movant”). Movant requests the Court to substitute Joyce W. Lindauer, Joyce W. Lindauer Attorney, PLLC, 12720 Hillcrest Road, Suite 625, Dallas, Texas 75230 in place of Eric A. Liepins, who is currently attorney of record for the Debtors herein.

2. Movant further requests that the Court authorize and approve the payment by Debtors to Movant of a retainer in the amount of \$20,000.00.

3. Movant will file the statement required pursuant to §329 and Rule 2016(b) upon substitution as counsel and payment of the requested retainer.

4. Given the short time frames that counsel will be dealing with this is an expedited request.

WHEREFORE, PREMISES CONSIDERED, Movant respectfully requests that this Court grant the Motion for Substitution of Counsel, authorize the Debtors to pay Movant a retainer in the amount of \$20,000.00, and for such other and further relief to which Movant may be justly entitled.

Dated: April 24, 2019.

Respectfully submitted,

/s/ Joyce W. Lindauer
Joyce W. Lindauer
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Proposed Attorneys for Debtors

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on April 24, 2019, she contacted Eric Liepins regarding the substitution requested herein. Mr. Liepins indicated he did not oppose this Motion to Substitute Counsel.

/s/ Joyce W. Lindauer
Joyce W. Lindauer

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 24, 2019, a true and correct copy of the foregoing document was served via United States first class mail, postage prepaid, upon the parties on the attached service list and ECF electronic filing for those persons receiving ECF notices.

/s/ Joyce W. Lindauer
Joyce W. Lindauer

Label Matrix for local noticing

0539-3

Case 18-33730-hdh11

Northern District of Texas

Dallas

Wed Apr 24 17:27:06 CDT 2019

JTVanceCNIM

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c/o Douglas Bynum Darrell W. Cook & Asso

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(u)Argos IOM Services, LLP and Martha (Lisa)

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 Cadwell James Bryant
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